

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BIGFOOT 4x4, INC.)	
)	
)	
Plaintiff,)	
v.)	Case No.: 22-cv-6758
)	
)	Judge LaShonda A. Hunt
The Individuals, Corporations, Limited)	
Liability Companies, Partnerships, and)	Magistrate Judge Jeffrey T. Gilbert
Unincorporated Associations Identified on)	
Schedule A Hereto)	
)	
Defendants.)	

**THE DAOEN DEFENDANTS’ OPPOSED MOTION TO COMPEL PRODUCTION OF
DOCUMENTS AND AWARD FEES AND COSTS**

Pursuant to Local Rule 37.2 and Federal Rules of Civil Procedure 34 and 37, Defendants Shenzhen Daoen Model Technology Co., Ltd., Shenzhen Aoxinfa Technology Co., Ltd., and Shenzhen Tianqinli Technology Co., Ltd. (collectively, the “Daoen Defendants”) respectfully move this Court to compel the production of documents responsive to certain Requests for Production specifically identified in the corresponding Memorandum in Support and order Bigfoot to pay any fees and expenses related to this Motion to Compel.

Date: November 17, 2023

Respectfully submitted,

/s/ Todd R. Tucker

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Technology Co., Ltd., and Shenzhen Tianqinli
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CERTIFICATE OF COMPLIANCE WITH LR 37.2

I hereby certify that counsel for the Daoen Defendants and Bigfoot conferred on October 13, 2023, in an attempt to resolve this dispute but were unsuccessful. Andrew Alexander and Brian Doney, counsel for the Daoen Defendants, spoke via telephone with Bill Kalbac, counsel for Bigfoot. Counsel for the Daoen Defendants then followed up several times with Bigfoot counsel via email, but the Parties were unable to resolve this dispute.

/s/ Todd R. Tucker

One of the attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2023, the foregoing was served upon counsel of record by virtue of the Court's electronic filing system.

/s/ Todd R. Tucker

One of the attorneys for Defendants